

*\$2020 pd # 465407002452*FILED  
U.S. DISTRICT COURT  
JAN 25 2012 PM 3:40  
S.E. OF NEW YORKIN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

WILLIAM SZYMCZAK, STEFAN SCHUELE,  
 KIM DREHER, MARIO LOPEZ, MELANIE  
 RIVERA, KATRINA BOYD,  
 ANGELA GREATHOUSE,  
 CORNELIUS JACKSON, DAVID  
 SIMONS, LOLITA DILLARD, and  
 ANNE STEWART, individually and  
 on behalf of others similarly situated,

Plaintiffs,

-against-

NISSAN NORTH AMERICA, INC.,  
 and NISSAN MOTOR CO., LTD.,

Defendants.

Civil Action Number:  
10-CV-07493(JFM)(PD)**MOTION TO ADMIT  
NINA S. MCDONALD  
PRO HAC VICE****Document Filed  
Electronically**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for  
 the Southern District of New York, I, David M. Covey, a member in good standing of the bar of  
 this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name: Nina S. McDonald  
 Firm Name: Sedgwick LLP  
 Address: 1717 Main Street, Suite 5400  
 City/State/Zip: Dallas, TX 75201  
 Phone Number: (469) 227-8200  
 Fax Number: (469) 227-8004  
 Email Address: nina.mcdonald@sedgwicklaw.com

Nina S. McDonald is a member in good standing of the bar of the State of Texas. There  
 are no pending disciplinary proceedings against Ms. McDonald in any state or federal court, as  
 shown in the Certificate of Good Standing from the Texas State Bar, a copy of which is attached  
 hereto as **Exhibit 1**.

Dated: New York, New York  
 January 24, 2012

Respectfully Submitted,

By: 

David M. Covey (DMC-3729)

Sedgwick LLP

*Attorneys for Defendants*

Nissan North America, Inc. and Nissan Motor Co., Ltd.

125 Broad Street, 39th Floor

New York, New York 10004

(212) 422-0202

# STATE BAR OF TEXAS



*Office of the Chief Disciplinary Counsel*

January 20, 2012

Re: Nina Schultz McDonald, State Bar Number 24056282

To Whom It May Concern:

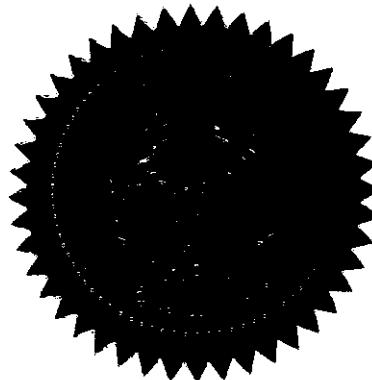
This is to certify that Ms. Nina Schultz McDonald was licensed to practice law in Texas on November 3, 2006, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

No previous disciplinary sanctions have been entered against Ms. McDonald's law license.

Sincerely,

Linda A. Acevedo  
Chief Disciplinary Counsel

LA/aa



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Defendants.

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10-CV-07493(JFM)(PD)

**AFFIDVIT OF DAVID M.  
COVEY IN SUPPORT OF  
MOTION TO ADMIT  
NINA S. MCDONALD  
PRO HAC VICE**

**Document Filed  
Electronically**

State of New York )  
:ss  
County of New York )

David M. Covey, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Sedgwick LLP, counsel for defendants Nissan North America, Inc. and Nissan Motor Co., Ltd. ("Defendants") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Nina S. McDonald as counsel pro hac vice to represent Defendants in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1975. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this Court.

3. Ms. McDonald has been an attorney at my firm, Sedgwick LLP, for over five years.

4. Ms. McDonald is a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

5. Accordingly, I am pleased to move for the admission of Nina S. McDonald, pro hac vice.

6. I respectfully submit a proposed order granting the admission of Nina S. McDonald, pro hac vice, which is attached hereto as **Exhibit A**.

WHEREFORE it is respectfully requested that the motion to admit Nina S. McDonald, pro hac vice to represent Defendants in the above-captioned matter be granted.



DAVID M. COVEY (DMC-3729)

Sworn to before me this  
24<sup>th</sup> day of January 2012.

Jennifer Greenaway  
Notary Public

JENNIFER GREENAWAY  
Notary Public, State of New York  
No. 01GR6249002  
Qualified in Kings County  
Commission Expires September 26, 2015

**CERTIFICATE OF SERVICE**

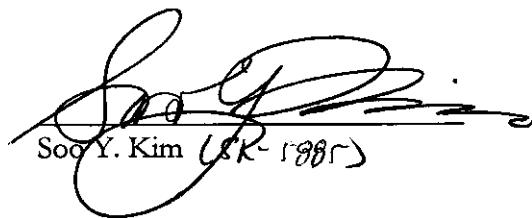
I, SOO Y. KIM, hereby certify and affirm that a true and correct copy of the attached MOTION TO ADMIT NINA S. MCDONALD PRO HAC VICE and EXHIBIT, AFFIDAVIT OF DAVID M. COVEY IN SUPPORT OF MOTION TO ADMIT NINA S. MCDONALD PRO HAC VICE and EXHIBIT ORDER FOR ADMISSION OF NINA S. MCDONALD PRO HAC VICE ON WRITTEN MOTION was served via regular mail on January 24, 2012, upon:

Gary S. Graifman  
Michael L. Braunstein  
747 Chestnut Ridge Road  
Chestnut Ridge, NY 10977

Howard T. Longman  
Stull, Stull & Brody  
6 East 45<sup>th</sup> Street, Suite 500  
New York, NY 10017

Matthew Mendelsohn  
David A. Mazie  
Mazie Slater Katz & Freeman, LLC  
103 Eisenhower Parkway  
Roseland, NJ 07068

Dated: New York, New York  
January 24, 2012



Soo Y. Kim (SK-1885)